

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF SETH
A. GOLDBERG, ESQ.**

SETH A. GOLDBERG, ESQ., being of full age, certifies as follows:

1. I am a Partner at Duane Morris LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC. I am also Lead Counsel and Liaison Counsel for all Defendants in this MDL. I make this Certification based on personal knowledge and in support of the Defendants' Joint Motion to Exclude the Opinions of Dipak Panigrahy, M.D.
2. Attached hereto as Exhibit A is a true and accurate copy of the Rule 26 Expert Report of Dipak Panigrahy, MD, dated July 6, 2021, served in MDL 2875.
3. Attached hereto as Exhibit B are true and accurate copies of transcripts of Days 1 and 2 of the deposition of Dipak Panigrahy, M.D., in MDL 2875, dated September 9, 2021 and September 10, 2021.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts of the transcript of the deposition of Lewis A. Chodosh, Ph.D., in MDL 2875, dated September 29, 2021.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts of the transcript of the deposition of Mahyar Etminan, M.D., in MDL 2875, dated August 25, 2021.

6. Attached hereto as Exhibit E is a true and correct copy of “Lifetime exposure to rubber dusts, fumes, and N-nitrosamines and cancer mortality in a cohort of British rubber workers with 49 years follow-up” by Hidajat, et al.

7. Attached hereto as Exhibit F is a true and correct copy of “Dietary N-nitroso compounds and risk of pancreatic cancer: results from a large case-control study” by Zheng, et al.

8. Attached hereto as Exhibit G is a true and correct copy of excerpts of the transcript of the deposition of David Madigan, Ph.D., in MDL 2875, dated August 5, 2021.

9. Attached hereto as Exhibit H is a true and correct copy of excerpts of the transcript of the deposition of Herman J. Gibb, in MDL 2875, dated September 30, 2021.

10. Attached hereto as Exhibit G is a true and correct copy of a document produced in discovery in MDL 2875 bates labeled PRINSTON0075838.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg, *Lead Counsel and
Liaison Counsel for Defendants*

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Dated: November 1, 2021